

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

RAMAS CAPITAL MANAGEMENT, LLC and
GANESH H. BETANABHATLA,

Defendants.

CASE NO. 4:22-cv-2979

**DEFENDANTS GANESH BETANABHATLA AND
RAMAS CAPITAL MANAGEMENT, LLC'S
DESIGNATION OF EXPERT WITNESS**

Pursuant to this Court's Scheduling Order (Dkt. No. 15), Defendants Ganesh Betanabhatla and Ramas Capital Management, LLC (collectively, "Defendants") designate Mr. Keith Palzer as a retained expert witness in this case. Mr. Palzer is a management consultant and investment banker. Mr. Palzer will: (a) provide background information about investment advisers and investment funds; (b) testify on industry standards of care and conduct for investment advisers, including investment advisers that advise private investment funds; (c) testify on Defendants' conduct in relation to those standards; and (d) testify on the scope and import of relevant transaction documents. A copy of Mr. Palzer's CV is attached as Exhibit A. Defendants will serve Mr. Palzer's expert report in accordance with the Court's Scheduling Order.

Defendants reserve their right to supplement or amend this designation if and as appropriate.

Dated: February 28, 2023

Respectfully submitted,

/s/ Alex Lipman

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**ATTORNEYS FOR DEFENDANTS RAMAS
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GANESH H. BETANABHATLA**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served on all counsel of record via email on February 28, 2023.

/s/ Hector R. Chavez

Hector R. Chavez